

In the event the action is assigned to a magistrate judge, each party shall execute and file within 20 days of its appearance a form, either consenting to the jurisdiction of the magistrate judge or electing to have the case randomly assigned to a district judge. If a party elects to have the case assigned to a district judge, the magistrate judge shall continue to manage the case by deciding non-dispositive motions and submitting reports and recommendations on dispositive motions, unless otherwise directed by the district judge.

The court strongly encourages participation and cooperation in the expanded use of the magistrate judges as judicial officers with full authority to manage and ultimately dispose of civil actions.

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Phillip James Mannarelli  
Plaintiff

vs.

Case No. 2:22-cv-724

PA Department of Transportation  
Dr. John Carosso  
Optum Insurance  
Chase Enterprises  
AFSCME  
Defendant(s)

#4 1546

Fee Paid

FILED

MAY 16 2022

**EMPLOYMENT DISCRIMINATION COMPLAINT**

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

**PARTIES**

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

Phillip James Mannarelli  
1407 Woodbourne Ave  
Pittsburgh, Pennsylvania ~~8148808733~~  
USA county 15226  
8148808733

Phillip Mannarelli: 83@gmail.com

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

PA Department of Transportation  
45 THOMS RUN ROAD  
Bridgeville PA 15017

Chase Enterprises

Oswego NY

Dr. John Carosso

AFSCME

Monroeville PA

Optum Insurance

### **JURISDICTION**

The Court has jurisdiction over this action under 28 U.S.C. § 1331.

3. This employment discrimination lawsuit is based on (check only those that apply):

- a. ☒ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et. seq.*, for employment discrimination on the basis of race, color, religion, gender, or national origin. **NOTE:** *In order to bring suit in federal district court under Title VII, you must first obtain a right to sue letter from the appropriate administrative agency.*
- b. Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et. seq.*, for employment discrimination on the basis of age (age 40 or older). **NOTE:** *In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the appropriate administrative agency.*
- c. American with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et. seq.*, for employment discrimination on the basis of disability. **NOTE:** *In order to bring suit in federal court under the American with Disabilities Act, you must first obtain a right-to-sue letter from the appropriate administrative agency.*
- d. Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et. seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance. **NOTE:** *In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate administrative agency.*
- e. Other (please describe)

4. If you are claiming that the discriminatory conduct occurred at a location other than the defendant's address above, please provide the following information on where the conduct occurred:

PA

5. When did the discrimination occur? Please give the date or time period:

Past 5 years until now.

### **ADMINISTRATIVE PROCEDURES**

6. Did you file a charge of discrimination against the defendant(s) with the Equal Employment Opportunity Commission or other federal agency?

- a. ☒ Yes      Date filed: Not sure
- b. No

7. Have you received a Notice of Right to Sue Letter?

- a. ☒ Yes      If yes, please attach a copy of the letter to this complaint.
- b. No

### **NATURE OF THE CASE**

8. The conduct complained of in this law suit involves (check only those that apply):

- a. Failure to hire me
- b. ☒ Termination of my employment
- c. Failure to promote me

- d. Failure to accommodate my disability
- e. ☒ Terms and conditions of employment differ from those of similar employees
- f. ☒ Retaliation
- g. ☒ Harassment
- h. ☒ Other conduct (please specify):  
Hostile work environment. Discriminatory behavior.
- i. Did you complain about this same conduct in the charge of discrimination, referred to in number 6 above?  
☒ Yes  
No

9. I believe that I was discriminated against because of my (check all that apply):

- a. Race
- b. Religion
- c. National origin
- d. Color
- e. ☒ Gender
- f. Disability
- g. Age (my birth year is: )
- h. ☒ Other conduct (please specify):  
Sexuality harrassment.

10. Did you state the same reason(s) in the charge of discrimination, referred to in number 6 above?

- ☒ Yes  
No

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct (i.e. how, where, and when). Each paragraph must be numbered separately, beginning with number 11. Please write each allegation of discrimination in a separately numbered paragraph.

11.

**REQUEST FOR RELIEF**

State briefly and exactly what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

12. I would like monetary compensation to put everything that happened to me from PennDOT, and all involved parties behind me. Not being allowed to work bc of not having sex at work has been very stressful for me.

I am also seeking the following amount in monetary compensation: \$2,000,000.00/PER-DEFENDENT.

Date

Signature of Plaintiff

Mailing Address:  
Phillip James Mannarelli  
4407 Woodbourne Ave

 5-14-2022  
DRS.